

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MINNETONKA MOCCASIN
COMPANY, INC.

Plaintiff,

v.

JOHN DOES 1-10

Defendants.

Case No. 22-cv-0087 (PJS/TNL)

**MOTION FOR PROTECTIVE
ORDER GOVERNING DISCOVERY**

MOTION FOR PROTECTIVE ORDER GOVERNING DISCOVERY

Plaintiff Minnetonka Moccasin Company, Inc. (“Minnetonka”) respectfully moves the Court to enter a protective order governing discovery that is in substantially the same form as the model Stipulated Protective Order available on the Court’s website. Pursuant to the Court’s Order, (ECF No. 10), Minnetonka has issued subpoenas to third-parties in this litigation to ascertain the identity of the Doe Defendants. While the third-party subpoena recipients have indicated a willingness to provide responsive information, they have also requested the ability to designate the information as confidential. Of note, certain of the third-party subpoena recipients have asked to be notified before any such confidential material is used in litigation, as reflected in Section 6(b) of the proposed protective order. Because Minnetonka has yet to identify the Doe Defendants, there is not another party with which Minnetonka can stipulate to the entry of the protective order, and so moves the Court. Accordingly, and for good cause shown, Minnetonka respectfully requests that the Court enter the proposed Protective Order filed herewith.

Date: May 18, 2022

/s/ Jason T. Johnson

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